

11/17/04 BDB/junior



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

10/14/04

69 FR 61049

November 15, 2004

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Mr. Michael T. Lesar, Chief
Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Lesar:

**TENNESSEE VALLEY AUTHORITY (TVA) – COMMENTS ON PROPOSED
GENERIC COMMUNICATION - ESTABLISHING AND MAINTAINING A
SAFETY-CONSCIOUS WORK ENVIRONMENT (VOL. 69 FEDERAL REGISTER
61049, DATED OCTOBER 14, 2004)**

TVA appreciates the opportunity to comment on the proposed generic communication.

TVA endorses the comments provided by the Nuclear Energy Institute (NEI) in response to the above proposed generic communication. As the NRC knows, TVA is one of many licensees which has put significant resources into and made great strides in establishing and maintaining a safety-conscious work environment. TVA shares the concerns described by NEI that the “across the board” approach taken by the subject Regulatory Issue Summary (RIS) may indeed be counterproductive. The RIS, as written, can become a prescriptive tool and is fraught with subjectivity. We continue to believe that in matters related to safety-conscious work environment, it should be left up to the licensee--the entity ultimately responsible for establishing and maintaining that environment-- to implement those practices and programs best suited to its particular circumstances and needs.

TVA urges NRC to fully consider and adopt the views expressed by NEI on this very important matter and reconsider the need to issue a safety-conscious work environment RIS.

E-RIS = ADM-03

Adm = A. Markley (MTH)

Template = ADM-013
Printed on recycled paper

U.S. Nuclear Regulatory Commission

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If you have any questions, please contact Susan Ferrell at (423) 751-7737.

Sincerely,

A handwritten signature in black ink, appearing to read "Fredrick C. Mashburn". The signature is fluid and cursive, with a large initial "F" and "M".

Fredrick C. Mashburn
Senior Program Manager
Nuclear Licensing

cc: U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001